

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD.,  
SAMSUNG ELECTRONICS AMERICA,  
INC.,

Defendants.

Case No. 2:22-cv-00422-JRG-RSP

**JURY DEMANDED**

**JOINT CLAIM CONSTRUCTION CHART UNDER P.R. 4-5(d)**

Pursuant to Local Patent Rule 4-5(d), Plaintiff Headwater Research LLC (“Headwater”) and Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively, “Samsung”) jointly submit this Joint Claim Construction Chart containing the agreed and disputed claim terms, phrases, or clauses of U.S. Patent Nos. 9,137,701 (“701 patent”), 9,143,976 (“976 patent”), 9,271,184 (“184 patent”), 9,277,433 (“433 patent”), 9,277,445 (“445 patent”), 9,521,578 (“578 patent”), 9,609,544 (“544 patent”), 10,237,773 (“773 patent”), and 11,405,224 (“224 patent”) (collectively, “the asserted patents”). A chart identifying the parties’ disputed constructions is attached hereto as Exhibit A, listing the complete language of claims with terms in bold type and separate columns for each party’s proposed construction, pursuant to P.R. 4-5(d). The parties have not agreed upon any constructions.

Dated: February 1, 2024

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**CERTIFICATE OF SERVICE**

I hereby certify that counsel of record who are deemed to have consented to electronic service are being served on February 1, 2024, with a copy of this document via the Court's CM/ECF.

/s/ Marc Fenster  
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